

Message

From: Smith, Yvonne [smith.yvonne@epa.gov]
Sent: 10/22/2020 7:12:07 PM
To: Groh, Nathan [Nathan.Groh@blackhillscorp.com]; Mark.Seaman@erm.com
CC: Williams, Mike [Mike.Williams@tetrattech.com]; Chiccine, Catherine [chiccine.catherine@epa.gov]; george.lynn@erm.gov
Subject: Follow up on Citizens Gas and Electric Company Site, Iowa - Technical Kickoff Meeting hosted by Black Hills Corporation

Good Afternoon,

The purpose of this email is to make a record of the items that were discussed in today's Citizens Gas and Electric Company Site, Iowa - Technical Kickoff Meeting, hosted by the Respondents.

Of note, in most instances, deliverables have a draft review requirement before final deliverable is approved. For example, the Work Plan Draft is due 75 days from 9/30/2020. Once EPA has had the opportunity to review and changes or recommendations have been addressed, the Final Work Plan is to be submitted within the next 75 days.

Secondly, per our discussion, unless otherwise requested, all deliverables pertaining to this specific Site can and should be sent electronically with special accommodations for larger files, and EPA does not require hard copies. When larger files require submission, there will be more coordination between EPA or EPA contractor and ERM to receive files electronically, with hardcopy deliverables as a last resort.

Also, we discussed different aspects of communication. The ideal form of communication is through email, as this is the best form of recordkeeping. As far as communication on timeliness of deliverables, as outlined in the ASAOC, a minimum of a 7 day notification is specified. However, a lot of resources have and are becoming even more challenging as COVID-19 cases spike across the region and the nation.

In the case that a deliverable cannot be submitted on time due to COVID, an email notification at a minimum to myself at smith.yvonne@epa.gov and the designated site EPA attorney, chiccine.catherine@epa.gov stating the reason or reasons for the delay and a new submission date with justification will be required. As discussed, this will be on a case by case basis, and if needed respondents may also seek relief under the provisions of Section XVI (Force Majeure) of the ASAOC. If a delay should be anticipated and/or encountered, a meeting should convene to discuss alternatives and next steps the soonest.

Finally, we discussed the standard requirement of an Administrative Record hardcopy file for the community to access. I will follow up with that requirement upon consultation with the EPA Community Involvement Coordinator, and stand by for the designated respondent point of contact, which Tara Regan had suggested may be Lynn Porter (Black Hills Community Relations).

Please provide Lynn Porter's contact information so that I may set up a meeting with the EPA Community Involvement Coordinator in order to discuss the Community Involvement Plan for this site.

On a final note, it was very nice to speak to all of you today and looking forward to working with all on this project.

Yvonne M. Smith | On-Scene Coordinator

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Respectfully,

Yvonne M. Smith | On-Scene Coordinator

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